

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

United States District Court
Southern District of Texas
FILED

NOV - 7 2016

David J. Bradley, Clerk of Court

STATE OF TEXAS,

ROBIN CLARICE PAREZANIN,
RHONDA FLEMING,
Plaintiff-Intervenors,

v.

No. B-14-254

UNITED STATES OF AMERICA, ET AL.

MOTION FOR INDICATIVE RULING ON A MOTION FOR RELIEF
BARRED BY A PENDING APPEAL

MOTION TO RECONSIDER

The Intervenors move the Court to reconsider its decision denying intervention into this case pursuant to Fed. R. Civ. Proc., Rule 62.1 and Rule 59. The Court denied the Motion to Intervene on August 31, 2016 however, the Plaintiffs were not provided with a notice or copy of the order. The Plaintiffs did not find out about the denial until some six weeks later, too late to file a motion to reconsider.

Rule 62.1 allows the Court to state it would grant a motion if the court of appeals remands for that purpose or that the motion raises a substantial issue. Because the Plaintiffs were not given notice of the denial of their motion and the Court did not have an opportunity to consider the Plaintiffs sur-reply to the Defendants, the Court may entertain a motion to reconsider.

MOTION TO RECONSIDER

A Rule 59(e) motion must clearly establish "either a manifest error of law or fact or must present newly discovered evidence." *Marseilles Homeowners Condo Ass'n v. Fidelity Nat'l Ins. Co.*, 542 F.3d 1053, 1058 (5th Cir. 2008). When a motion to reconsider is filed outside the 28-day window, it is evaluated under the standard of Rule 60(b). *Stangel v. United States*, 68 F.3d 857, 859 (5th Cir. 1995).

First, the Plaintiffs believe that there has been a manifest legal error because the Court did not address the four-part test for intervention as a matter of right pursuant to Rule 24(a). Because the Plaintiff-Intervenors are entitled to Intervene and the Original Plaintiffs are not opposed, having affirmatively consented by not filing a motion in opposition. The Court gave no reason that the Plaintiff-Intervenors statutory right to intervene should be denied under any of the provisions. In fact, the Fifth Circuit Court of Appeals has no opinion to review from the Court. The Court does have a right to reconsider the Motion to Intervene and the other pleadings filed by the Plaintiff-Intervenors in September 2016. *Purcell v. Keane*, 438 F.2d 103 (3rd Cir. 1971)(holding that a district court can reconsider motion to intervene as litigation progresses).

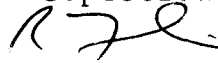
This Circuit has held that for the appellate court to review intervention rulings of court below, appellate court must have before it findings based upon record evidence, and in absence of thereof, district court's ruling denying leave to intervene will be vacated and case remanded to district court for further proceedings. Please see, *Calhoun v. Cook*, 487 F.2d 680 (5th Cir. 1973)(Holding that without addressing the merits of the motion to intervene, the denial of the motion was not proper).

The Plaintiff-Intervenors have proven that they have a "direct, substantial and legally protectable" right to intervene in this case where illegal aliens will have more rights than lawful U.S. citizens because they were granted deferred prosecution in an unconstitutional class-wide basis, clearly a prima facie case of unequal treatment, sadly against legal and lawful U.S. citizens.

ALTERNATIVE ACTION BY THE COURT

The Court may consider severing the claims under Rule 21 and opening a separate action. The Court should maintain jurisdiction over this action because the plaintiffs and defendants would remain the same.

Respectfully Submitted,



Rhonda Fleming, Plaintiff
October 31, 2016

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

STATE OF TEXAS,

ROBIN CLARICE PAREZANIN,
RHONDA FLEMING,
Plaintiff-Intervenors,

v.

No. B-14-254

UNITED STATES OF AMERICA, ET AL.

NEWLY DISCOVERED EVIDENCE IN SUPPORT OF
MOTION TO RECONSIDER
MOTION TO INTERVENE

The Plaintiff-Intervenors have filed a Motion to Reconsider their Motion to Intervene, which raised a 14th Amendment equal protection claim against the Defendants, where the Defendants granted class-wide deferral of prosecution to a favored class, illegal aliens and rewarded their unlawful conduct with the President's executive orders through DAPA and DACA. The Motion to Reconsider was filed by mail on October 31, 2016.

In support of the Motion, the Plaintiff-Intervenors presents the attached evidence of the deferred prosecution of over 400 persons, most in this country illegally, involved in immigration fraud, marriage fraud, tax fraud, and of course, illegal entry violations, in the case of United States v. Sandoval|| No. 3:14-cr-00020-N, LEXIS 59790, (N.D. TX 2015). The Plaintiff-Intervenors is attaching an exhibit from a filing by the Defendants in the Sandoval case, where the Defendants identified at least 364 illegal aliens that were involved in immigration fraud, tax fraud, and marriage fraud, with the assistance of lawful, permanent residents, who when they were interviewed during the investigation, alleged they were victims of identity theft.

The fact is that many of these legal|| permanent residents referred their family and friends to Defendant Sandoval, were paid for referrals, thus profitting off of the scheme.

Defendant Sandoval and her entire family, all natural born citizens, were prosecuted for immigration fraud. Not one of the over 400 illegal and legal, permanent residents

alleging identity theft were prosecuted. Not one illegal alien found in the country, involved in immigration fraud, tax fraud, marriage fraud, and guilty of illegal entry, were deported...not one deported.

The Plaintiff-Intervenors believe if granted discovery, they can prove that many of the persons involved in the Sandoval immigration fraud case have benefitted from DAPA and DACA.

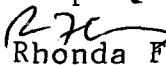
This is a clear case of national origin discrimination against natural born U.S. citizens. Defendant Sandoval and other co-defendants did not solicit these illegal aliens, they were solicited by the persons illegally in the country, proof that illegal aliens entice U.S. citizens into criminal acts, and then are not prosecuted.

The primary claim of the Plaintiff-Intervenors is that U.S. citizens are being prosecuted for violating federal law and illegal aliens, guilty of numerous federal offenses are not prosecuted, but are being granted a form of clemency or amnesty for their crimes.

90% of these aliens in the Sandoval case are still in Texas and will compete for jobs with the Plaintiff-Intervenors. They have a right to own guns and will use Texas identification to vote--illegally. All of this will occur while the Plaintiff-Intervenors are denied the most basic fundamental right, their physical freedom due to unequal treatment under the law.

The Plaintiff-Intervenors obtained this document in the last week, after the Court's denial of the Motion to Intervene. This is prima facie evidence of a constitutional violation of the Plaintiff-Intervenors' rights as U.S. citizens.

For the reasons stated, the Plaintiff-Intervenors moves the Court to grant their motion and order the Defendants to respond within 21 days to the claim of selective prosecution and/or unequal treatment under the law of U.S. citizens. The core issue of the case brought by the State of Texas and 26 other states is that these persons are in the country illegally in violation of our laws and have no right to benefit for their illegal conduct, while the Defendants continue to prosecute their own citizens.

Respectfully Submitted,

Rhonda Fleming, Plaintiff
November 1, 2016

No	ID Victim	Link to Frances and/or Monica
1	Andrés Aguilar Fraudulent filings: 2 Tadeo Aguilar (CI Eduardo Rhio) Jose Aguilar (CI Cesar Gamboa)-10/18/11	Victim, was interviewed and stated as follows: -He and family members, for years, had gone to two women who owned their own business, Frances and Monica, for tax assistance, and had gone to Monica a few times in the last few years to renew his LPR card -Daughter is close friend of Stephanie Caeres, sister of Carolina Caeres who works with Monica - recalled several instances when both Frances and Monica seemed to be living well outside their financial means - last time daughter saw Frances in April 2013, showing off brand new Cadillac -id both Frances and Monica
2	Alberta Alvarez Fraudulent filings: 3 Alma Torres (USCIS Alma Montellano) Eugenio Castro (2) - 1/31/11; 1/25/13	-This is the identity that Monica used when preparing the fraudulent immigration filings for CIs in this case -Victim, was interviewed and stated as follows: -For years went to Frances to have taxes done -ID Frances -This is the identity that Frances used when preparing the fraudulent immigration filings for undercover Alma Montellano (Torres)
3	Lourdes Arriaga Fraudulent filings: 29 Jose Alvarado (3) - 2000 to 2004 Jaime Cardona (8) - 1998 to 2012 Jose Casas (6) - 2000 to 2011 Yolanda Galicia (1) - 1/22/01 Cosme Gonzalez Arriaga (1) - 11/24/97 Rogelio Martinez (1) - 8/4/00 Raul Martinez (2) - 10/12/95; 11/12/97 Raul Navea (4) - 1999 to 2012 Jose Rivera (1) - 4/10/01 Victor Rivera (1) - 2/28/01	Victim, was interviewed and stated as follows: -7 children - petitioned for Laura and Angel, the rest were born in the United States -Used Frances to prepare her taxes for 10 years - Frances was well-known for income tax and immigration matters and would guarantee a large cash refund for her clients; she would borrow dependents from one client to use for another client who did not have dependents -Monica helped in the office -Gave Frances copies of ID documents because trusted her -ID both Frances and Monica Allen, Fernando Navea, was interviewed and admitted that Lourdes Arriaga is not his biological mother. He stated that Frances assisted him with the earlier 1-817 filings, but that Monica assisted him with last filing. (The birth certificate in last filing was translated by Monica, and a work folder with his name was found at Monica's office during search warrant.)

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4	Sandra Bejarano Fraudulent filings: 4 Armando Hernandez (2)-11/5/10; 1/17/13 Octavio Hernandez (2)-6/29/11; 10/24/13	Victim, was interviewed and stated as follows: -Children: Valeria Vargas, Moises Bejarano, and Alejandro Uribe -Uses Frances, office in Oak Cliff, to file her taxes -Frances requested copy of alien registration card and social security card -Allen, Octavio Hernandez, was interviewed and admitted that Bejarano was not his mother. He used Frances to file his 1-817; she convinced him that she was an immigration attorney and could help him obtain a work permit, but did not explain how. He paid her \$3,000 and she said she would take care of everything. Filings included fraudulent birth certificate (translated by Frances' husband Bartolo Contreras and notarized by Frances' daughter Lidia Saldaña), victim's alien registration card, and fraudulent tax returns for victim showing alien as dependent from 1988 to 1999.
5	Marcos Benitez Salazar Fraudulent filings: 4 Cesar Benitez (1) - 1/26/98 Elena Benitez (2) - 12/11/97; 8/28/00 Raul Benitez (1) - 12/9/97	-Elena Benitez filed fraudulent 1-817 claiming to be wife of ID victim; the filing included handwritten tax returns with same handwriting as others linked to Frances. On 5/1/03, Elena was interviewed at POE when returned to US. She admitted she had never lived with or met her alleged husband (ID victim), and that Frances had arranged the fake marriage and prepared all the documents; She was removed to Mexico. -Cesar Benitez filed fraudulent 1-817 claiming to be child of ID victim - used counterfeit birth certificate from Zacatecas (confirmed not to exist) -Raul Benitez filed fraudulent 1-817 claiming to be child of ID victim - used counterfeit birth certificate from Zacatecas (confirmed not to exist)

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6	<p><u>Rosa Blanco</u> Fraudulent filings: 14</p> <p>Eliseo Alvarez (1) - 2/1/00 Maria Cano (3) - 1999 to 2004 Jose Capulin (1) - 1/22/00 Douglas Cruz (4) - 2000 to 2006 Catalina Cuevas (1) - 1/22/00 Hugo Rodriguez (1) - 1/22/00 Juan Rodriguez (1) - 10/16/98 Laurio Salvidar (1) - 5/19/99 Hector Vera (1) - 5/19/99</p>	<p>Victim, was interviewed and stated as follows: -4 children: Jose Jies Blanco, Ana Gloria Blanco, Maria Alicia Blanco, and Juan Antonio Blanco -Common-law husband is Ruben Feliciano (also ID victim) -Frances helped her apply for LPR status in 1980s -Frances prepared tax returns for many years until 2006 -Provided Frances with alien registration card and social security card -Monica also worked in the office -ID both Frances and Monica</p>
7	<p><u>Victoria Carbajal-Lopez</u> Fraudulent filings: 16</p> <p>Beatrix Quintana (2) - 5/24/00; 3/23/01 Maria Quintana (2) - 5/24/00; 3/23/01 Marta Quintana (2) - 5/23/00; 1/15/03 Alberto Kobles (3) - 2000 to 2004 Yolanda Rojas (3) - 2000 to 2003 Joel Ruiz (3) - 2000 to 2004 Ramiro Saucedo (1) - 4/20/00</p>	<p>Victim, was interviewed and stated as follows: -Became LPR 11/30/89 -5 children with the last name Carbajal: Virginia, Maria del Carmen, Augustina, Lupita, and Mark Anthony - all born in the US -Sometime prior to 2005, attempted to use tax services of woman in Fortia, TX, but line of people waiting was too long and decided to go elsewhere -Woman requested and made copies of green card and social security card -Woman was short, heavy set with light complexion</p>
8	<p><u>Fayola Davila</u> Fraudulent filings: 20</p> <p>Jose Delson (1) - 12/15/98 Jesus Gantes (3) - 1998 to 2004 Omar Miramontes (7) - 1998 to 2012 Hector Ramirez (1) - 1/17/01 Sandra Rendon (1) - 9/11/00 Jose Rivera Davila (2) - 2/22/99; 1/17/00 Edmundo Rodriguez (1) - 1/23/99 Miguel Rodriguez (1) - 1/22/00 Azael Valdez (1) - 3/11/99</p>	<p>Victim, was interviewed and stated as follows: -Became LPR 10/2/89 -5 children: Rogelio, Ariel, Alvaro, Carla, Jose -Tax returns prepared by Nancy Moreno in Fortia, TX -Stopped going to Moreno b/c she committed fraud -For taxes, Moreno asked for green card and SS card -Son recently used Monica to prepare his taxes -ID Monica, not ID Frances -Work folder for Jesus Gantes found at Monica's office</p>

9	<p><u>Marta Del Carmen Quiroz</u> Fraudulent filings: 14</p> <p>Juan Acuche (2) - 10/2/00; 11/19/01 Guillermo Mancera (1) - 8/11/99 Francisco Ovalle (1) - 3/21/97 Jose Perez (3) - 1999 to 2001 Gerardo Quiros (1) - 1/7/98 Elise Quiros (1) - 1/7/98 Daniel Ramirez (3) - 3/17/97 Horcencia Teller (1) - 5/9/01 Jose Uribe (1) - 2/28/01</p>	<p>According to N-400 (application for naturalization) filed on 4/16/06, ID victim is married to Jose Manuel Salazar and has 1 child, Melissa Yvonne Calderon -Fraudulent filing for Jose Perez alleges that Perez is ID victim's husband. The marriage license is from Zacatecas. Filing included handwritten tax returns with handwriting linked to other fraudulent filings by Frances -Fraudulent filing for Francisco Ovalle alleges that Ovalle is ID victim's husband. The marriage license is from Zacatecas -Fraudulent filing for Daniel Ramirez alleges Ramirez is ID victim's child. The fraudulent birth certificate is from Zacatecas. In the filing is an affidavit notarized by Frances -Fraudulent filings for Horcencia Teller, Gerardo Quiros, and Elisa Quiros all have fraudulent birth certificates from Zacatecas -Fraudulent filing for Juan Acuche alleges that Acuche is ID victim's child. However, Acuche submitted an application in 2005 to adjust his status through a USC spouse, and submitted birth certificate showing his mother is actually Elaida Esquivel</p>
10	<p><u>Ruben Feliciano</u> Fraudulent filings: 4</p> <p>Martinez Alvarez (3) - 2000 to 2004 Petra Rincon (1) - 1999</p>	<p>Victim, was interviewed and stated as follows: -Became LPR 12/1/90 -Common law wife Rosa Blanco (also ID victim) -Does not have any biological children and has never petitioned for anyone to enter US -Has not filed federal taxes in over 7 years because he is no longer employed, but previously used the services of Frances who had an office in Fortia, TX -Provided Frances with his social security card and his alien registration card and \$50 to do his taxes -Frances' daughter also worked at the office, could not remember her name, but she also worked for immigration -ID Frances and Monica</p>

11	<p>Julian Garcia Fraudulent filings: 12 Eliesser Garcia (2) 9/24/98; 7/1/02 Fernando Garcia (2) - 1/1/59; 7/1/03 Graciela Garcia (1) 3/17/00 Maria Garcia (2) - 1999 to 2004 Rafael Garcia (3) - 1999 to 2004 Roman Garcia (1) - 9/11/00</p>	<p>Review of ID victim's A-file showed the following: -Became LPR 12/4/87 -9 children: Maria; Juan; Maria Isabel; Roberto; Rolando; Alvaro; Cesar; Eric; and Jesus -Fraudulent I-817's had fraudulent birth certificates (confirmed that birth records do not exist), and 3 of them were from Zacatecas. Also fraudulent filings had handwritten tax returns in same handwriting linked to other filings by Frances/Monica -Eliesser's fraudulent filing had affidavits notarized by Frances -Rafael and Maria later filed I-687's, which used notary stamp of Freddy Gomez, associated with other filings by Frances</p>
12	<p>Juventino Gonzalez Fraudulent filings: 6 Claudia Gonzalez (3) - 1995 to 2002 Maria Guadalupe Gonzalez (3) - 1994 to 2000</p>	<p>Victim, was interviewed and stated as follows: -10 children with last name Gonzalez: Jose, Miguel, Ramon, J. Francisco, Maria, Martin, Edith, Ana, Maria, Ruby, Sofia -Adjusted status in 1986 with Frances' assistance -Daughter, Maria de Jesus, went to Monica for help with work permit -ID Monica and Frances -Wife is Maria Gonzalez -FOIA request in Monica's office, purportedly signed by wife, Maria Gonzalez, requesting copy of A-file for review, dated 1/14/13 -Claudia Gonzalez, who was involved in marriage fraud with Frances' son, Edward Moreno, previously filed an I-817, claiming Juventino Gonzalez was her biological father. At marriage fraud interview and as witness at trial of co-defendant Bartolo Contreras, she admitted that she is actually Claudia Pulido-Moreno, and that Frances created false birth certificate to support the fraudulent I-817 filing - that victim is not actually her father. The fraudulent birth certificate is translated and notarized by Frances. -Maria Guadalupe Gonzalez is Claudia's sister; she married USC Joshua Nick Sandoval 8/26/11 - close to the time of Claudia's fraudulent marriage, but no immigration forms were filed</p>

13	<p>Margarita Gonzalez Fraudulent filings: 13 Jose Arreola (6) - 1998 to 2013 Marco Castaneda (1) - 2/8/99 Maribel Cerecena (2) - 9/4/98; 8/7/03 Hermilia Chiquito (2) - 11/20/98; 3/9/01 Jose Delgado (1) - 2/6/01 Della Lopez Gonzalez Lauro Lopez Gonzalez (1) - 9/29/98</p>	<p>Victim, was interviewed and stated as follows: -Became LPR in 1988 and nat in 1999 -6 children - Bernardita, Leticia, Gerardo, Flor, Elizabeth, Maciel, and Victor -Frances helped her to adjust her status and helped her children (positioned for Victor, Gerardo, Flor, and Maciel) - Frances' office in Oak Cliff -Monica also works at the office -Stopped going to Frances because Frances neglected to follow up with immigration filings of 2 daughters -Has been receiving letters from USCIS containing names of strangers -ID Frances and Monica -Rebecca Arreola was interviewed on 6/12/15. She stated that Frances (whom she identified out of photo lineup) assisted her and her husband (Jose Antonio Arreola). Frances provided them with fake birth certificates and supporting documents. They each paid \$1500 initially and \$300 for renewals. (Rebecca used ID victim Juanita Lozano Pedraza)</p>
14	<p>Thomas Gutierrez Fraudulent filings: 34 Juan Dominguez (9) - 2000 to 2011 Juan Escareno (6) 1998 to 2010 Moises Escareno (5) 1998 to 2010 J Carmen Franco (1) 1/22/00 Daniel Graciano (2) 12/18/00; 11/7/03 Marco Morales (1) 1/12/00 Antonio Oviedo (5) 2000 to 2011 Jose Quintana (4) 2000 to 2004 Eduardo Sanchez (1) 2/2/01</p>	<p>According to I-687 filed by ID victim on 10/13/87, she has two children: Maria Esmeralda and Nestor, Jr. -All 9 fraudulent filings used the exact two same pieces of supporting documents, social security card and alien registration card belonging to ID victim -All 9 fraudulent filings included counterfeit or altered birth certificates (confirmed birth records do not exist), and 6 of the 9 were from Zacatecas -Fraudulent I-817 filing (2008) for Juan Escareno included tax returns prepared by Monica -Additionally, Escareno filed I-687 in 2005 with an affidavit written by Lidia Saldana and notarized by Frances. -Fraudulent I-817 filing for Moises Escareno included 2012 tax return prepared by Monica -Fraudulent I-817 filings for Daniel Graciano and Marco Morales included handwritten tax returns with the same handwriting as in other packages linked to Frances</p>

15	<p><u>Maria Teresa Heredia</u> Fraudulent filings: 17 -Jaime Adame (2) - 1/7/00; 12/11/00 -Abelardo Arreola (5) - 1998 to 2012 -Samuel Barron Aguirre (1) - 7/14/98 -Maria Coronado (1) - 1/4/00 -Edith Gusman (2) - 2/12/01; 9/14/04 -Jose de Jesus Moreno (1) - 7/31/00 -Jose Rizo (1) - 7/11/00 -Javier Rodriguez (1) - 7/13/98 -Heracio Silva (2) - 8/26/98; 7/17/03 -Felipe Vazquez (1) - 8/5/98</p>	<p>Victim, was interviewed and stated as follows: -She has 3 children: Omar, Brenda, and Emily -Frances in Ferris, Texas completed her LPR application in 1980s; Frances also assisted with her N-400 (application for naturalization) and I-130 for her parents -ID Frances; not ID Monica -Alien, Abelardo Arreola, interviewed and stated I-817 applications he filed (using ID victim Maria Heredia) were completed by either Frances or Monica, depending on who was in the office. He spoke with Monica directly about his case a few times, and is certain that Monica completed a few of his I-817s</p>
16	<p><u>Rafael Hernandez Mendez</u> Fraudulent filings: 13 Blanca Hernandez (4) - 1997 to 2002 Daniel Hernandez (2) - 12/23/99; 7/31/03 Francisco Hernandez (1) - 1/30/02 Jesus Hernandez (1) - 1/25/00 Jose Hernandez (1) - 1/25/02 Miguel Hernandez (2) - 9/24/97; 7/6/01 Rose Hernandez (1) - 9/24/97 Virginia Hernandez (1) - 9/24/97</p>	<p>Victim, was interviewed and stated as follows: -5 children - Fobioia, Blanca Asuncion, Miguel Angel, Alma Rosa, and Terecia de Jesus -Frances completed his LPR application in late 80s -Frances helped with tax returns -Frances filed I-130 for son Miguel Angel Hernandez -Has not used Frances' services since 1992 -Frances' office in Ferris, Texas -ID Frances; not ID Monica Alien, Daniel Hernandez, interviewed and stated I-817 applications he filed (using ID victim Rafael Hernandez) were completed by Frances, to include supporting docs and fraudulent birth certificate for \$5000</p>
17	<p><u>Rosalia Hernandez</u> Fraudulent filings: 10 Lorena Chairez (1) - 9/14/99 Miguel Martinez (3) - 1999 to 2008 Jose Najera (1) - 9/15/99 Jose Jesus Torres (2) - 7/12/99; 8/5/03 Horacio Ulloa (1) - 1/7/02 Adolfo Ulloa (1) - 1/8/02</p>	<p>Victim, was interviewed and stated as follows: -Children: Arely Hernandez, Edmundo Overa, and Juan Jose Moreno -Frances completed the immigration forms for her daughter Arely (17 years ago) -2 years ago went to Frances for help with work permit and referred to Monica in Red Oak; Monica charged \$1500 to complete work authorization but never received anything from immigration -ID both Frances and Monica</p>

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18	<p><u>Maria Estela Huerta</u> Fraudulent filings: 9 Daniel Lopez (2) - 11/20/98; 6/26/01 Edson Sainco (2) - 1999 to 2004 Arnulfo Vazquez (1) - 10/8/99 Maria Del Refugio Vazquez (6) - 1998 to 2010</p>	<p>Alien, Maria Del Refugio Rojas, interviewed and stated that Maria Estela Huerta is not her mother, and that she paid Frances \$2000 for each I-817 filing and \$2500 for the I-130/I-485 filing (filed I-130/I-485 based on recent marriage to USC, which was determined to be legitimate). Her relationship with Frances began by going to Frances for tax preparation. She obtained the fraudulent birth certificate from Frances. I-817 also included copies of victim's alien registration card and social security card</p>
19	<p><u>Jorge Lopez</u> Fraudulent filings: 14 Carlos Lopez (1) - 7/24/01 Jaime Lopez (1) - 3/25/97 Jose Lopez (1) - 9/23/97 Juana Lopez (1) - 5/14/99 Lazaro Lopez (1) - 5/16/01 Maria Lopez (4) - 1997 to 2004 Miguel Lopez (1) - 8/24/99 Oscar Lopez Mercado (1) - 1/7/00 Rafael Lopez (1) - 7/24/01 Rodolfo Lopez (2) - 12/9/97; 1/12/98</p>	<p>Victim, was interviewed and stated as follows: -LPR since 5/25/90 -10 children: Manuel, Martin, Oswaldo, Filemon, Raul, Jesus, Jose, Mariela, Oralia, Guadalupe -Petitioned for son Jose Manuel Lopez -Lived in Ferris, TX for 15 years and Frances completed tax returns; stopped going to her because moved to Fort Worth -Provided Frances with birth certificate and alien registration card for tax preparation -Not ID Frances - but hasn't seen in over 10 years -Described Frances as short, overweight woman</p>
20	<p><u>Juanita Lozano</u> Fraudulent filings: 14 Rebecca Arreola (6) - 1999 to 2013 Cesar Ceballos (2) - 1999 to 2004 Carlos Diaz (1) - 1/7/99 Julio Martinez Pedraza (1) - 11/24/97 Claudia Rodriguez (1) - 12/23/99 Miguel Sanchez (1) - 8/24/98 Martin Torres (1) - 1/7/00</p>	<p>Victim filed I-687 in 1987 to adjust her status with the following information: -Children (all with last name Lozano): Luis, Miguel, Graciela, and Sandra -Became LPR 3/27/90 -Counterfeit birth certificates used in fraudulent filings (confirmed not to exist) -Copies of same Social Security card and alien registration card (belonging to ID victim) used in filings -Many of fraudulent filings contained handwritten tax returns, same handwriting as other fraudulent I-817 filings linked to Frances/Monica -Work folder for Claudia Rodriguez was found at Frances' office with copies of fraudulent I-817s and receipt for \$700 dated 8/20/10 -In fraudulent filing for Julio Pedraza there were 2 affidavits notarized by Frances -Rebecca Arreola was interviewed on 6/12/15. She stated that Frances (whom she identified out of photo lineup) assisted her and her husband (Jose Antonio Arreola). Frances provided them with fake birth certificates and supporting documents. They each paid \$1500 initially and \$500 for renewals. (Jose used ID victim Margarita Gonzalez)</p>

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21	Armando Mendez Hernandez Fraudulent filings: 11 Abenito Mendez (2) - 9/11/00; 6/8/01 Ivan Mendez (1) - 12/12/96 Juan Mendez (3) - 1994 to 1997 Lucio Mendez (1) - 9/25/01 Pablo Mendez (2) - 2/24/97 San Jose Mendez (2) - 11/01/01; 7/29/04	Victim, was interviewed and stated as follows: -7 children with last name Mendez-Vasquez: Juan, Ma Auxilio, Esmelda, Maribel, Martha Susana, Blanca Reyna, and Armando -Frances helped him to adjust his status in 1988, and after he became an LPR, he used her services to file income tax returns; provided her with alien registration card and birth certificate to complete his taxes -Saw Monica several times at Frances' office and also went to Monica's office to complete his taxes -ID both Frances and Monica
22	Juan Francisco Mendez Fraudulent filings: 6 Alberto Mendez (1) - 9/18/97 Gregorio Mendez (1) - 7/9/96 Guadalupe Mendez (4) - 1996 to 2004	Information obtained from ID victim's A-File: -Became LPR in 1990 -N-400 filed 7/12/12 showed the following children (all with the last name Mendez-Chavez): Juan, Jose Carlos, Octavio, Ana Maria, Toribio, Sandra Nely, Jesus, Gloria, Alma, and Juan D. -All three fraudulent I-817 filings had fraudulent birth certificates (confirmed not to exist) from Zacatecas and handwritten tax returns, with same handwriting linked to filings by Frances/Monica -Guadalupe filed I-687 in 2004, with affidavits and tax returns prepared by Monica and Frances
23	Rafael Mendez Trejo Fraudulent filings: 7 Maria Mendez (3) - 1997 to 1999 Rafael Mendez (4) - 1997 to 2011	Victim, was interviewed and stated as follows: -Became LPR in 1990s -Children: Bianca, Leili, Sandra, Guadalupe, Martha, and Rafael -Reviewed petitions filed by Maria Mendez (claim to be his wife) and Rafael (claim to be his son) - not his family members -Went to Frances' office on main street in Ferris to get taxes done for over 10 years; Frances is short and overweight

24	Roberto Mendez Fraudulent filings: 16 Jaime Mendez (1) - 9/24/97 Juan Mendez (13) - 1998 to 2013 Maria Mendez (1) 12/11/97 Felipe Mendez (1) 1/2/98	Victim, was interviewed and stated as follows: -Has 6 children, and only petitioned for 2 - Ethain and Olivia. Other children are Fermín, María, Maricela, and Juan Manuel (not same aliens who filed I-817s using his name) -Went to Frances to complete his income tax returns for 15 years -Frances assisted him with his immigration filings and the filings for his children -Alien, Juan Manuel Mendez, was interviewed and stated that he met Frances around 1998 after learning that she had assisted others with immigration matters; met at office in Ferris, TX; paid \$4,000 to start immigration paperwork; she never explained how she would help but that she would take care of it; admit father is not Roberto Mendez. The I-817s that alien filed included victim's alien registration card, fraudulent tax returns in victim's name with alien as a dependent from 1988 to 1994 and a fraudulent birth certificate
25	Ruben Mendez Hernandez Fraudulent filings: 2 Evangeline Mendez (1) - 12/19/95 Maria Cruz (1) - 1/16/96	*Evangeline filed I-817 in 1995, claiming to child of victim, Ruben Mendez Hernandez, born on 10/18/77; however, in 2003 filed I-485 to adjust under the Life Act, with birth certificate showing born on 10/18/73 to father Jose Mendez. Mexican officials determined the I-485 birth certificate was valid, making I-817 birth certificate (from Zacatecas) false. *Victim's biological children, Maria Cruz-Mendez and Ruben Alejandro Mendez filed I-817s in 1996 and 1995, respectively. Evidence that Frances assisted on filings as there are 2 affidavits in Ruben's package that are notarized by Frances. Additionally, the I-817s for both Maria and Ruben are handwritten, and the handwriting is the same. Although Maria is actually Ruben's child, her I-817 was supported by fraudulent birth certificate that made her younger, in order to be eligible for benefits. Date of birth changed from 12/5/1974 to 12/17/1978. Mexican officials confirmed that 12/5/1974 is the actual date of birth.

26	<p>Ubaldo Mendez Fraudulent filings: 14 -Joel Mendez - CI Cesar Gamboa (4) between 1997 and 2004 -Eduardo Mendez - CI Eduardo Nino (2) between 1997 and 1999 -Ricardo Mendez (6) - 1997 to 2006 -Ricardo Mendez (2) - 4/8/97; 11/24/97</p>	<p>Allen, Joel Mendez (actually CI Cesar Gamboa) was interviewed and stated that he met Frances at her tax business in Fortis in 1996 and that she counterfeited his documents to make it appear that Ubaldo Mendez was his father. His roommate, Eduardo Mendez (actually CI Eduardo Nino), also stated that Frances assisted him with his fraudulent filings. Both agreed to cooperate as CIs in the investigation of the case</p>
27	<p>Ricardo Palacios Fraudulent filings: 14 Evangelina Ramirez (1) - 3/8/01 Obed Flores (5) - 2001 to 2012 Pedro Flores (1) - 3/8/01 Andres Ramirez (1) - 5/21/01 Marcos Ramirez (4) - 2001 to 2012</p>	<p>-Became LPR 10/29/90 -Children: Griselda, Italia, Amalia, Maria, Ricardo, and Santos -Passed away in June 2012 -Lived in Fortis for years before moving to Italy, TX -Fraudulent filings: Evangelina claimed to be spouse of victim, and Obed and Pedro claimed to be step children - all using fraudulent marriage license for victim and Evangelina. In truth, Evangelina is married to Pedro and Obed is their child -Work folders for Obed Flores and Pedro Flores found in Frances' office -Obed Flores interviewed on fraudulent 1-817. He admitted that Frances prepared the fraudulent filings and provided the support documents for \$2,000. His parents, Pedro and Evangelina initiated his and their fraudulent filings through Frances when he was a teenager. At that time he did not understand the fraud, but he did when he went back to Frances in 2010 to renew his application. -Marcos Ramirez interviewed on 5/21/15. He admitted that Frances assisted him with his first 2 fraudulent filings and that she provided the supporting documentation to include the fraudulent birth certificate. He paid her around \$20,000 in fees -Andres Ramirez - claimed to be stepchild of ID victim in fraudulent filing - claiming his mother was Evangelina. In 2002, he submitted an application for a green card with his actual birth certificate showing his mother is Maria Del Carmen Perilla and his father is Francisco Ramirez Diaz</p>

28	<p>Maria Ramon Fraudulent Filings: 5 Lorena Almaraz (1) - 5/23/00 Martin Barco (1) - 5/23/00 Javier Franco (1) - 11/22/00 Margarito Lora (2) - 10/2/00; 12/7/01</p>	<p>Victim's N-400, filed 11/13/06 (application for naturalization) shows the following: -Became LPR 6/24/91 -5 children: Dora Esperanza, Julia Emmeline, Roser, Maria Luz, Blanca Ondina, and Flor Isabel -Counterfeit birth certificates from Zacatecas used in fraudulent filings -Allen registration card and social security card of Maria Ramon used in fraudulent filings</p>
29	<p>Augusta Vargas Fraudulent Filings: 13 Hugo Ayala (1) - 7/9/99 Daniel Calderon (1) - 1/18/01 Jose Calderon (1) - 11/22/00 Arremon Carrizales (3) - 1999 to 2004 Manuel Gomez Vargas (1) - 6/26/01 Fernando Mendez (3) - 1999 to 2009 Jorge Munoz - (1) - 4/29/99 Abel Oida (1) - 7/22/99 Pedro Vargas (1) - 2/2/00</p>	<p>Victim's N-400, filed 8/13/11 (application for naturalization) shows the following: -Became LPR 1/28/89 -5 children: Araceli Villa, Maevida Villa, Maria Hill, Nedlin Glover, and Maria Adelice -Counterfeit birth certificates from Zacatecas used in some of fraudulent filings; others had altered birth certificates -Handwritten tax returns to support the applications, same handwritten as fraudulent packages known to have been prepared by Frances/Monica -Allen, Fernando Mendez interviewed on 6/12/15. He stated that fraudulent birth certificate and supporting documents were provided by Frances (whom he identified from photo lineup). He paid her \$1200 for the initial filing and \$400 for renewals</p>
30	<p>Dario Vasquez Fraudulent Filings: 13 Alberto Vasquez (5) - 1999 to 2011 Demetrio Vasquez (1) - 7/21/97 Jose Vasquez (1) - 10/1/97 Juan Vasquez (3) - 1996 to 1997 Santiago Vasquez (3) - 1997 to 2002</p>	<p>Victim was interviewed and stated as follows: -Became LPR 12/1/90 and filed N-400 in 1999 -Frances in Fortis helped him to adjust his status - last saw her in 1986 -6 children: Gabriel, Francisca, Elena, Martin, Evelyninda, and Adam Allen, Juan Gabriel Lopez, interviewed on 7/8/13 and stated that Dario Vasquez is his grandfather; went to Frances in 1996 because heard she could help with adjusting his status; she said he could get his green card using his grandfather's green card, and she already had copies of those documents; paid \$500 and given envelope with 1-817 application to mail to INS; at time of second filing, again paid \$500 - saw fraudulent birth certificate, claiming that Vasquez was his father rather than his grandfather; Frances said he could adjust his status if married a USC and offered to facilitate for \$5000</p>

31	<p><u>Maria Villegas</u> Fraudulent Filings: 22 Antonio Arroyo (2) – 1/17/01; 11/18/03 Jesus Bustamonte – (7) – 2000 to 2012 Roberto Hernandez (2) – 4/27/99; 5/9/02 Jose Mendez (4) – 1997 to 2000 J. Natividad Prado (2) – 7/15/99; 8/7/03 Martín Prado (1) – 6/6/00 Rafael Prado Tavera (1) – 8/11/99 Amelia Rodriguez – (1) – 7/16/99 Julian Romo (1) Alberto Vera Villegas (1) – 10/8/99</p>	<p>Victim, was interviewed and stated as follows: --Has 3 sons: Jose Alejandro Gonzalez, Luis Enrique Gonzalez, and Noe Alberto Gonzalez --Has not petitioned for anyone since become LPR --Went to USCIS in 2009 because receiving receipt notices for people that she did not know --Alien, Antonio Arroyo, interviewed and stated that Frances completed the I-817 applications he filed (using ID victim Maria Villegas) and provided the alien registration card and social security card of Villegas, fraudulent birth certificate and supporting evidence - \$2500 for application and \$250 for birth certificate; ID both Frances and Monica</p>
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